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Brandon Morgan 10/05/03 Aviation Law NPRM

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The notice of proposed rulemaking the Federal Aviation Administration is asking for comments on is regarding the use of enhance flight vision systems during IFR conditions. The use of enhanced flight vision systems will allow descent below decision height (DH), decision altitude (DA), or minimum descent altitude (MDA). This allowance would be very useful in very poor visibility approaches and landings.

The current rules are for use by natural vision and they do not compensate for the use of enhanced flight vision systems. An EFVS or enhanced flight vision system is a device that uses imaging sensor technologies to provide a real time visual image of the external scene topography. This will allow the pilot to see things such as runway lights and precision approach indicator lights. Now the EFVS is different from the synthetic vision, which provide a computer-generated image. The real time image is of the EFVS is much more reliable and much safer.

Current Federal Aviation Regulations states that no landing may be made or completed below the prescribed DH or MDA under IFR conditions unless the designated visual references and visibility requirements are met. However the current requirements as I mentioned earlier do not allow for the use of devices such as the EFVS. The new requirements will allow the approach to be continued if the EFVS has visual of the required approach items.

The FAA proposes to allow the EFVS to be used if it is readily available to the pilot with all of the other necessary flight information in a readable and easy to see format. The other flight information would be airspeed, altitude, descent rate, and other information. The FAA also is saying that the information should be in the form of a heads up display. However, the FAA also states the heads up display should also be able to be overseen by looking through and seeing naturally.

I would have to say that I agree with the FAA's proposed rules about the EFVS. The necessary steps have been taken to make sure that the safety is the utmost importance. The adding of the heads up display I feel will make the difference, rather than having to look down at a screen, then to the

limits the number of lights that may be used to identify the runway. Through the EFVS descent down below the DH or DA is authorized if the EFVS can see the approach light system or the runway threshold and the touch down zone. I feel that little part is necessary for safety as the newer IFR pilots can sometimes become overconfident on the ability of computers.

Another thing the EFVS does that I like is that it only offers vision enhancement. It does not however fly the plane. The ability to be in the plane must be in the hands of the pilot and when operating at lower altitudes such as 100 feet above ground level quick flying is sometimes all the pilot has to rely on.

The one thing I do not agree with is that of the Category II and Category III approaches. A category II and III approach are not authorized to descend below DH or MDA even with the use of EFVS. I feel that if the category I approaches are capable of using the EFVS, then the category II and III approaches should also be allowed to use it.

In conclusion I think the FAA is right on target with this proposed rule and technological advancement. I feel that the Federal Aviation

Administration has taken the necessary precautions for safety and regard for human life. The technology has been around and now the aviation industry is

finally utilizing the use of the available technology. I offer my full support for this rule and will back it all the way.